

NOTICE: THIS DOCUMENT CONTAINS SENSITIVE DATA.

CAUSE NO. 2019-78453

IN THE MATTER OF THE	§	IN THE DISTRICT COURT
MARRIAGE OF	§	
	§	
RONALD FRANKLIN LESHINSKI	§	
AND	§	507TH JUDICIAL DISTRICT
IRMA ALEJANDRA LESHINSKI	§	
	§	
AND IN THE INTEREST OF	§	
ALEXANDER RONALD LESHINSKI	§	
AND DOMINIC ALESSANDRO	§	
LESHINSKI, CHILDREN	§	HARRIS COUNTY, TEXAS

RESPONDENT’S ORIGINAL ANSWER

In response to RONALD FRANKLIN LESHINSKI’s Original Petition for Divorce filed on October 28, 2020, IRMA ALEJANDRA LESHINSKI files this Original Answer.

Parties

1. IRMA ALEJANDRA LESHINSKI is the Respondent in this action. The last three numbers of IRMA ALEJANDRA LESHINSKI's Texas driver’s license number are 070. The last three numbers of IRMA ALEJANDRA LESHINSKI's Social Security number are 030.

General Denial

2. Pursuant to Rule 92 of the Texas Rules of Civil Procedure, IRMA ALEJANDRA LESHINSKI enters a general denial.

UCCJEA Statement

3. Each party to this suit resides in Texas. The information required under Section 152.209 of the Texas Family Code is not applicable.

Protective Order

4. No Protective Order. A protective order under Title 4 of the Texas Family Code is not in effect between the parties in this suit, and no application is pending before the Court.

Statement on Health Insurance

5. The information required under Section 154.181(b) and Section 154.1815 of the Texas Family Code will be filed with this Court before any hearing on Temporary Orders or a Final Order.

Military Service

6. IRMA ALEJANDRA LESHINSKI is not currently in military service and has not been for more than ninety days prior to the filing of this Answer, and is therefore not entitled to any of the rights and protections afforded under the Servicemembers Civil Relief Act, 50 U.S.C. App. Sections 501, et. seq.

Attorney's Fees

7. IRMA ALEJANDRA LESHINSKI engaged Taly Thiessen, a licensed attorney, to prepare and prosecute this suit. As part of the just and right division of the community estate, as well as for prosecution of this suit affecting the parent-child relationship, including but not limited to conservatorship, support and protection of the children, IRMA ALEJANDRA LESHINSKI petitions this Court to render judgment for reasonable and necessary attorney's fees, expenses, and costs through trial and appeal in her favor and against RONALD FRANKLIN LESHINSKI, and order the judgment to be paid directly to Taly Thiessen. IRMA ALEJANDRA LESHINSKI requests this Court to award post-judgment interest as permitted by law.

Prayer

IRMA ALEJANDRA LESHINSKI requests that this Court grant the relief requested in IRMA ALEJANDRA LESHINSKI Original Answer and for general relief.

IRMA ALEJANDRA LESHINSKI requests that this Court grant her request for attorney's fees, expenses and costs as set forth above.

Respectfully submitted,

THIESSEN LAW FIRM
733 E 12 1/2 Street
Houston, TX 77008

Phone: 713-864-9000 | Fax: 713-864-9006

/s/ Taly S. Thiessen

Taly Thiessen

Attorney for: IRMA ALEJANDRA LESHINSKI

Bar no: 24074476

Email: taly@thetexasrialattorney.com

CERTIFICATE OF SERVICE

I certify that a true copy of this document was served in accordance with Rule 21a of the Texas Rules of Civil Procedure on the following on September 29, 2020.

Via Electronic Service: jemmott@grayreed.com
GRAY REED MCGRAW LLP
Jack Emmott III
1300 Post Oak Blvd., Suite 2000
Houston, Texas 77056
Attorney for RONALD FRANKLIN LESHINSKI

/s/ Taly S. Thiessen

Taly Thiessen

Attorney for IRMA ALEJANDRA LESHINSKI